

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

TERRA TERSUS, LLC §
§
Plaintiff, § CASE NO. 6:17-00697-RWS-KNM
§
vs. § LEAD CASE
§
XTO ENERGY, INC. §
§
Defendant. §

JOINT MOTION FOR ENTRY OF AGREED E-DISCOVERY ORDER

Plaintiff Terra Tersus, LLC (“Plaintiff”) and Defendants XTO Entergy, Inc. and National Oilwell Varco, L.P. (collectively, “Defendants”) jointly submit an Agreed E-Discovery Order, attached hereto as Exhibit A.

Dated: April 13, 2018

Respectfully submitted,

<p>/s/ <u>Andrew G. DiNovo</u> Andrew G. DiNovo Texas State Bar No. 00790594 adinovo@dinovoprice.com Adam G. Price Texas State Bar No. 24027750 aprice@dinovoprice.com Daniel L. Schmid Texas State Bar No. 24093118 dschmid@dinovoprice.com Gabriel R. Gervey Texas State Bar No. ggervey@dinovoprice.com DINOVO PRICE LLP 7000 N. MoPac Expressway, Suite 350 Austin, Texas 78731 Telephone: (512) 539-2626 Facsimile: (512) 539-2627</p>	<p>/s/ <u>Charles E. Phipps</u> Charles E. Phipps Texas State Bar No. 00794457 cphipps@lockelord.com Paul D. Lein Texas State Bar No. 24070133 plein@lockelord.com LOCKE LORD LLP 2200 Ross Avenue, Suite 2800 Dallas, Texas 75201 Telephone: (214) 740-8000 Facsimile: (214) 740-8800</p>
	<p>COUNSEL FOR DEFENDANT XTO ENERGY, INC.</p>

/s/ Charles S. Baker
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<p><i>COUNSEL FOR PLAINTIFF TERRA TERSUS LLC</i></p>	<p>cbaker@lockelord.com LOCKE LORD LLP 600 Travis, Suite 2800 Houston, Texas 77002 Telephone: (713) 226-1200 Facsimile: (713) 223-3717</p> <p><i>COUNSEL FOR DEFENDANT NATIONAL OILWELL VARCO, L.P.</i></p>
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to FED. R. CIV. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on April 13, 2018.

/s/ Andrew G. DiNovo _____

Andrew G. DiNovo